UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

No. 1:19-CR-10080-NMG

GREGORY COLBURN et al.,

Defendants

MOTION FOR LEAVE TO FILE ONE-AND-A-HALF-PAGE REPLY

Defendants Gamal Abdelaziz, Marci Palatella, and John Wilson respectfully request leave of Court to file a one-and-a-half-page Reply to Dkt. 2039, the government's Opposition to (1) Motion in Limine to Exclude Evidence or Reference to Donna Heinel Personally Receiving Any Money from Rick Singer (Dkt. 2010); and (2) Motion in Limine to Exclude Evidence of Private School Tuition Payments (Dkt. 1998). As grounds, Defendants state that these motions are critical to the case and Defendants respectfully submit that a Reply would be helpful to the Court. The proposed one-and-a-half-page Reply is attached as Exhibit A.

Dated: August 13, 2021 Respectfully submitted,

GAMAL ABDELAZIZ

By his attorneys,

/s/ Brian T. Kelly

Brian T. Kelly (BBO # 549566)
Joshua C. Sharp (BBO # 681439)
Lauren M. Maynard (BBO # 698742)
NIXON PEABODY LLP

53 State Street
Boston, MA 02109
(617) 345-1000
bkelly@nixonpeabody.com
jsharp@nixonpeabody.com
lmaynard@nixonpeabody.com

Robert Sheketoff (BBO # 457340) One McKinley Square Boston, MA 02109 617-367-3449

MARCI PALATELLA

By her attorneys:

/s/ Michael K. Loucks

Michael K. Loucks (BBO # 305520) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 500 Boylston Street Boston, MA 02116 (617) 573-4800 michael.loucks@skadden.com

Jack P. DiCanio (pro hac vice)
Emily Reitmeier (pro hac vice)
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
525 University Avenue
Palo Alto, CA 94301
(650) 470-4500
jack.dicanio@skadden.com
allen.ruby@skadden.com

JOHN WILSON

By his attorneys:

/s/ Michael Kendall

Michael Kendall (BBO # 544866)
Lauren M. Papenhausen (BBO # 655527)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
(617) 979-9300
michael.kendall@whitecase.com
lauren.papenhausen@whitecase.com

Andrew E. Tomback (pro hac vice) MCLAUGHLIN & STERN, LLP 260 Madison Avenue

New York, NY 10016 (212) 448-1100 atomback@mclaughlinstern.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on August 13, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Joshua C. Sharp Joshua C. Sharp